

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Khalil Billups and  
Adam R. Hageman,

Civil File No. 19-cv-2581 (NEB/DTS)

Plaintiffs,

vs.

**DEFENDANTS'  
MOTION TO DISMISS**

Minnesota Department of  
Corrections, Lt. J. Rykken, Lt.  
Engeldinger, Lt. Baird, Sgt. G.  
Brausen, Officer Fleck, Officer B.  
Hudek, Officer Matthew Kotaska,  
Officer Tyler Haugen, Officer  
Christopher Fadling, Officer  
Zachariah Frank, Officer J. Elmore,  
Officer J. Lehner, Officer Anderson,  
Officer Zencius, Officer S. Mielke,  
Warden Miles, and  
AWO Carol Krippner,

Defendants.<sup>1</sup>

To: Khalil Billups, OID #260067, MCF-Faribault, 1101 Linden Lane, Faribault, MN 55021; and Adam Hageman, OID #251041, MCF-Lino Lakes, 7525 Fourth Avenue, Lino Lakes, MN 55014.

PLEASE TAKE NOTICE that before the Honorable David T. Schultz, Magistrate Judge of the United States District Court, at a time and date to be determined by the Court, the defendants will move the Court for an order granting their request to dismiss plaintiffs Khalil Billups and Adam Hageman's claims against them. This motion is based on

---

<sup>1</sup> Lt. Rykken's first name is Jay, Lt. Engeldinger's first name is Todd, Lt. Baird's first name is Brant, Sgt. Brausen's first name is Gwen, Officer Fleck's first name is Ross, Officer Hudek's first name is Ben, Officer Elmore's first name is Jason, Officer Lehner's first name is Joseph, Officer Anderson's first name is Sean, Officer Zencius's first name is Grace, Officer Mielke's first name is Shawnee, and Warden Miles's first name is Eddie.

Fed. R. Civ. P. 12, the accompanying memorandum, and the pleadings filed with this Court.

Dated: May 4, 2021

KEITH ELLISON  
Attorney General  
State of Minnesota

s/ Corinne Wright-MacLeod  
CORINNE WRIGHT-MACLEOD  
Assistant Attorney General  
Atty. Reg. No. 0390353  
445 Minnesota Street, Suite 1400  
St. Paul, MN 55101-2131  
(651) 757-1198 (Voice)  
(651) 297-4139 (Fax)  
corinne.wright-macleod@ag.state.mn.us

ATTORNEYS FOR DEFENDANTS  
JAY RYKKEN, TODD ENGELDINGER,  
BRANT BAIRD, GWEN BRAUSEN, ROSS  
FLECK, BEN HUDEK, MATTHEW  
KOTASKA, TYLER HAUGEN,  
CHRISTOPHER FADLING, ZACHARIAH  
FRANK, JASON ELMORE, SEAN  
ANDERSON, GRACE ZENCIUS,  
SHAWNEE MIELKE, EDDIE MILES, AND  
CAROL KRIPPNER

|#4960350-v1